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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

OCT 09 2013

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER CULLOOYAH-FORD

Defendant.

CR-13-157-LRS

INDICTMENT

Violation:

16 U.S.C. §§ 3372(a)(2)(A),
3373(d)(1)(B)
Lacey Act

16 U.S.C. § 3374; 28 U.S.C. § 2461
Criminal Forfeiture Allegations

The Grand Jury Charges:

On or about November 3, 2011, in the Eastern District of Washington, Christopher Cullooyah-Ford, without permission under law to do so, did knowingly and unlawfully engage in conduct involving the sale, offer of sale, and intent to sell wildlife with a market value in excess of \$350 by transporting and selling wildlife in interstate commerce, to wit: one mule deer skull and antlers, which was taken in violation of an underlying law and regulation of a state, to-wit: Oregon Revised Statute § 496.705, all in violation of 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(1)(B).

Notice of Criminal Forfeiture Allegations

Upon conviction of the offense(s) in violation of 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(1)(B) (the Lacey Act) set forth in this Indictment, the Defendant, Christopher Cullooyah-Ford, shall forfeit to the United States, pursuant to 16 U.S.C. § 3374 and 28 U.S.C. § 2461, all wildlife imported, exported, transported, sold,

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1 received, acquired, or purchased contrary to the provisions of 16 U.S.C. § 3373, or
2 any regulation issued pursuant thereto, and all equipment used to aid in the
3 importing, exporting, transporting, selling, receiving, acquiring, or purchasing of
4 wildlife in violation of 16 U.S.C. § 3373, described as follows:

5 **WILDLIFE**

6 -One mule deer acquired on or about November 3, 2011, in the
Whitman National Forest region north of Joseph, Oregon.

7 **FIREARMS**

8 -Any and all firearms used to acquire the mule deer on or about
November 3, 2011 in the Whitman National Forest region north of
9 Joseph, Oregon.

10 If the property described above, as a result of any act or omission of the
11 defendant(s):

- 12 (a) cannot be located upon the exercise of due diligence;
- 13 (b) has been transferred or sold to, or deposited with, a third party;
- 14 (c) has been placed beyond the jurisdiction of the court;
- 15 (d) has been substantially diminished in value; or
- 16 (e) has been commingled with other property which cannot be divided
17 without difficulty;

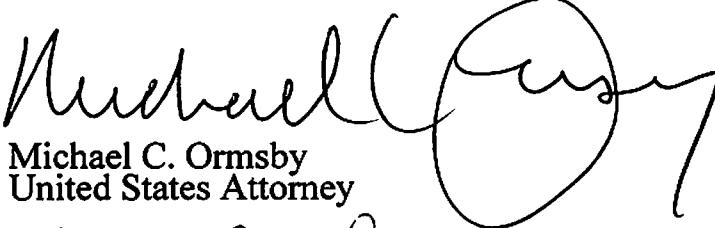
18 **INDICTMENT - 2**

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1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p), incorporated by 28 U.S.C. § 2461(c).

3
4 DATED this 8th day of October, 2013.

5 A TRUE BILL
6
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8 
9 Michael C. Ormsby
10 United States Attorney

11 
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13 Timothy J. Ohms
14 Assistant United States Attorney

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